

**UNITED STATES DISTRICT COURT
FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

JENNIFER MCGHEE, JENNIFER TOMCZAK,

Plaintiff(s),

v.

A&M (2015), LLC, fka YM, LLC USA dba ANNIE
SEZ dbh MANDEES; KEN SYRMPOULOS
INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY
AS VICE PRESIDENT OF SALES AND OPERATIONS
FOR A&M (2015), LLC,

Defendant(s).

Civil Action No. 16-3542

**STIPULATION FOR EXTENSION OF
TIME TO ANSWER OR OTHERWISE RESPOND**

Plaintiffs, by and through their undersigned attorneys, and Defendants, by and through their undersigned attorneys, hereby stipulate and agree to extend the time for Defendants to respond to Plaintiffs' complaint, and for the reasons set forth below respectfully request that the Court enter an order in the form submitted herewith:

1. On August 15, 2016, Plaintiffs filed their complaint.
2. Defendants were served with the summons and complaint on September 8, 2016.
3. The parties have not previously requested an extension of Defendants' responsive pleading deadline.

WHEREFORE, the parties respectfully request that the Court enter an order in the form attached hereto extending Defendants' responsive pleading deadline until October 14, 2016.

Dated: September 28, 2016

PORZIO, BROMBERG & NEWMAN, P.C.

By: s/Diane Fleming Averell
Diane Fleming Averell, Esq.

100 Southgate Parkway
Morristown, NJ 07962-1997
(973) 538-4006
(973) 538-5146

*Attorneys for Defendants A&M (2015), LLC, fka YM, LLC
USA dba ANNIE SEZ dbh MANDEES; KEN SYRMPOULOS
INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY AS VICE
PRESIDENT OF SALES AND OPERATIONS FOR A&M
(2015), LLC*

_____, 2016

KIMMEL & SILVERMAN, PC

By: _____
Craig Thor Kimmel, Esq.

30 East Butler Pike
Ambler, PA 19002

*Attorneys for Plaintiffs Jennifer McGhee and Jennifer
Tomczak*

Dated: September __, 2016

PORZIO, BROMBERG & NEWMAN, P.C.

By: _____
Diane Fleming Averell, Esq.

100 Southgate Parkway
Morristown, NJ 07962-1997
(973) 538-4006
(973) 538-5146

*Attorneys for Defendants A&M (2015), LLC, fka YM, LLC
USA dba ANNIE SEZ dbh MANDEES; KEN SYRMOPOULOS
INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY AS VICE
PRESIDENT OF SALES AND OPERATIONS FOR A&M
(2015), LLC*

9-28-16, 2016

KIMMEL & SILVERMAN, PC

By: _____
Craig Thor Kimmel, Esq.

30 East Butler Pike
Ambler, PA 19002

*Attorneys for Plaintiffs Jennifer McGhee and Jennifer
Tomczak*

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of September, 2016, the foregoing Stipulation For Extension Of Time To Answer Or Otherwise Respond was electronically filed using the CM/ECF System, and notice was given to all parties using this system.

September 28, 2016

PORZIO, BROMBERG & NEWMAN, P.C.

By: s/Diane Fleming Averell
Diane Fleming Averell, Esq.

100 Southgate Parkway
Morristown, NJ 07962-1997
(973) 538-4006
(973) 538-5146

*Attorneys for Defendants A&M (2015), LLC, fka YM, LLC
USA dba ANNIE SEZ dbh MANDEES; KEN SYRMPOULOS
INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY AS VICE
PRESIDENT OF SALES AND OPERATIONS FOR A&M
(2015), LLC*

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JENNIFER MCGHEE, JENNIFER TOMCZAK,

Plaintiff(s),

v.

A&M (2015), LLC, fka YM, LLC USA dba ANNIE
SEZ dbh MANDEES; KEN SYRMPOULOS
INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY
AS VICE PRESIDENT OF SALES AND OPERATIONS
FOR A&M (2015), LLC,

Defendant(s).

CIVIL ACTION NO.
16-3542

[PROPOSED] ORDER

AND NOW, this _____ day of _____, 2016, upon consideration of the parties' Stipulation for Extension of Time to Answer or Otherwise Respond, it is hereby ORDERED that Defendants shall file an answer or otherwise respond to Plaintiffs' complaint on or before October 14, 2016.

Chief Judge Petrese B. Tucker